

Generators - General:  
(Part 262 Subpart A)

DATE 5/16/88

CA D 008314908

INSPECTOR Lowe

Has the generator of solid wastes made a hazardous waste (H.W.) determination by determining if the waste is: 262.11-

(a) Excluded from regulation under 261.4?                               

(b) Listed as a H.W. in 261 Subpart D? X                          

(c) Exhibits a characteristic identified in 261 Subpart C by either:

(1) Testing the waste? X                          

(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?           N/A

(d) Excluded or restricted under 264, 265, or 268, if determined hazardous? X                          

Is the waste an exempt recyclable material: 261.6(a)(3)-

(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement)?           N/A

(ii) Used batteries or cells returned to the manufacturer for regeneration?                               

(iii) Used oil not burned for energy recovery?                               

(iv) Scrap metal?                               

(v-ix) Specific steel (K087) and petroleum refinery production wastes?                               

If the waste is any of the following recyclable materials, complete Parts 270 (permits and notifications), and 266 Subparts A-G of the TSD checklists: 261.6(a)(2)-

(i) Those used in a manner constituting disposal (Subpart C)?                               

(ii) H.W.s burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?                               

(iii) H.W. characteristic used oil that is burned as above (Subpart E)?                               

(iv) Those from which precious metals are reclaimed (Subpart F)?                               

(v) Spent lead-acid batteries that are reclaimed (Subpart G)?

Conditionally Exempt Small Quantity Generators  
(Part 261)

DATE 5/16/88

CA D 008314908

INSPECTOR Lowe

Does the facility qualify as a  
conditionally exempt small quantity  
generator each calendar month by:

Yes No Comments

Generating less than 100 kgs and  
accumulating less than 1000 kgs of H.W.  
on site? 261.5(a),(g) or:

Generating less than 1 kg of acute H.W.,  
or 100 kgs of acute H.W. contaminated soil  
or spill residues? 261.5(e)(1-2)

Did the quantity determination include all  
listed and characteristic wastes generated  
except: 261.5(d)-

(1) H.W. removed from on-site storage?

(2) H.W. produced by on-site treatment  
or reclamation of H.W. that was already  
counted once?

(3) Spent materials that have already been  
counted once and that are reclaimed, reused,  
and subsequently generated on site? or:

H.W. exempted from regulation? 261.5(c)

Has the conditionally exempt small  
quantity generator treated or disposed  
of the H.W. in an on-site facility, or  
ensured delivery to an off-site U.S. TSD,  
either of which is: 261.5(f,g)(3)-

(i) Permitted under Part 270?

(ii) In interim status under 265 and 270?

(iii) Authorized by an approved state under  
Part 271?

(iv) Permitted, licensed, or registered  
by a state to manage municipal or  
industrial solid waste? or:

(v) A facility which:

(A) Legitimately uses, reuses,  
recycles, or reclaims the waste? or:

(B) Treats its waste prior to use,  
reuse, recycling, or reclaiming?

or any month that the generator did not meet these requirements, go to next page.

Generators of Between 100 and 1,000 kg/month  
(Part 262)

DATE 5/16/88

CA D008314908

INSPECTOR Lowe

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(3) (Cont.) Complied with requirements for Subpart C, preparedness and prevention?	<u>X</u>		
Clearly marked the date accumulation started on each container?	<u>X</u>		
Labelled each container and tank with the words "Hazardous Waste"?	<u>X</u>		
Does the generator have at least one emergency coordinator (E.C.) on site or immediately available at all times? 262.34(d)(4)(i)	<u>X</u>		
Is the following information posted next to the telephone: 262.34(d)(4)(ii)-			
(A) E.C.'s name and phone number?	<u>X</u>		
(B) Location of fire extinguishers, spill control material, and any fire alarms?	<u>X</u>		
(C) If no direct alarms, the phone number of the fire department?	<u>X</u>		
Are all employees are familiar with their jobs' proper waste handling and emergency procedures? 262.34(d)(iii)	<u>X</u>		
If an emergency has occurred, has the emergency coordinator: 262.34(d)(iv)-			<u>NO emergency has occurred at the facility</u>
(A) Tried to extinguish the fire, or called the fire department?			
(B) In the event of a spill, contained the flow of H.W., and cleaned up as soon as possible?			
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800)424-8802 and reported:			
(1) The generator's name, address, and ID #?			
(2) Date, time, and type of incident?			
(3) Quantity and type of H.W. involved?			
(4) Extent of any injuries?			
(5) Estimated quantity and disposition of any recovered materials?			
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(e-f)	<u>X</u>		<u>TSD facility</u>

Generators:  
(Part 262)

DATE 5/16/88  
CA D 008,314,908  
INSPECTOR Lowe

Manifests: 262.20-

(a) Does the generator prepare a complete manifest according to the instructions (see Appendix) before transporting H.W. off-site?

Yes

No

Comments

X

(b) Does the generator designate on the manifest one facility which is permitted to handle H.W.?

X

(c) Has the facility designated an emergency alternate facility? or:

X

(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?

X

Did the generator use the supplied manifest required by a consignment State: 262.21-

(a) Where the receiving facility is? or, if not provided by that State:

X

(b) Where the generating facility is?

X

(c) If not provided by either State, the EPA form from another source?

N/A

Did the manifest consist of enough copies? 262.22

X

Did the generator: 262.23(a)

(1) Sign the manifest by hand?

X

(2) Obtain the signature of initial transporter and date of acceptance on manifest?

X

(3) Keep one copy of the manifest (per 262.40(a))?

X

Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)

X

If the shipment was sent by water or rail, was 262.23 complied with?

N/A

Pre-Transport Requirements:  
(262 Subpart C)

DATE 5/16/88

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INSPECTOR Lowe

Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30

Yes

No

Comments

X

Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31

X

Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:

X

Proper shipping name [table column 2]? X

Proper ID number [table column 3A]? X

Proper ORM designation for containers of ORM-A,B,C,D or E wastes? X

Are containers of 110 gallons or less marked with the following words? 262.32(b)

HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generators Name & Address X

Manifest Document Number X

X

Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33

X

Accumulation Time:

The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided: 262.34(c)(1)-

(i) H.W. from containers not in good condition or leaking were transferred into good containers? X

Containers are compatible with the H.W. stored in them? X

Containers are stored closed? X

(ii) The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? X

Iv. Pre-Transport Requirements:  
(Part 262 Subpart C)

DATE 5/16/88

FORM 11-908

INSPECTOR Lowe

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a)

Yes No Comments

— — N/A Permitted facility

Are containers visibly marked with the date accumulation started? 262.34(a)(2)

X — —

Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)

X — —

Does the generator comply with the requirements of 40 CFR Part 265: 262.34(a)(1), -(4)

Subpart I for the use and management of containers?

X — —

Subpart J for tanks (except 265.197(c), closure of tanks without secondary containment, and 265.200)?

— — N/A Facility only stores in containers

265.111 for tank closure performance standards?

— —

265.114 for tank decontamination after closure?

— — ↓

Subpart C for preparedness and prevention?

X — —

Subpart D for contingency plan and emergency procedures?

X — —

265.16 for personnel training?

X — —

If the generator has stored H.W. on-site for more than 90 days, have they: 262.34(b)

Been granted an extension from the EPA? or:

— — N/A Permitted facility

Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270 of RCRA?

— — ↓

Recordkeeping and Reporting:  
(Part 262 Subpart D)

DATE 5/16/88

CA D 008314908

INSPECTOR Lowe

Are the following kept for at least  
three years: 262.40-

(a) Manifest signed by the receiving  
facility?

Yes

No

Comments

X

(b) Biennial Reports and Exception  
Reports?

X

(c) Test results, waste analysis or  
other determinations made in accordance  
with 262.11?

X

Biennial Report:

If the facility has shipped any waste  
off-site to a U.S. TSD, have they  
submitted a Biennial Report to the RA  
by March 1 of each even numbered year?  
262.41(a)

X

Was the report submitted on EPA Form  
8700-13A and cover generator activities  
during the previous calendar year?  
262.41(a)

X

Does the report include the following  
information: 262.41(a)-

(1) EPA ID No., name and address of the  
generator?

X

(2) Calendar year covered by the report?

X

(3) The EPA ID No., name, and address  
for each off-site U.S. TSD to which  
H.W. was shipped during the year?

X

(4) Name and EPA ID No. of each  
transporter used during the year to ship  
to a U.S. TSD?

X

(5) Description, EPA hazardous waste  
No., DOT hazard class and quantity of  
each H.W. shipped off-site to a U.S. TSD?

X

Was this information listed by EPA  
ID No. of each off-site U.S. TSD to  
which H.W. was shipped?

X

Recordkeeping and Reporting: - Continued  
(Part 262 Subpart D)

DATE 5/16/88

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INSPECTOR Lowe

(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?

Yes

No

Comments

X

(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?

X

(8) The signed certification?

X

Exception Reporting: 262.42

(a) For a generator that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the H.W.?

N/A Facility has not had to file an exception report

(b) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?

Did the Exception Report include: 262.42(b)-

(1) A legible copy of the manifest?

(2) A signed cover letter explaining the efforts taken to locate the H.W. and the results of those efforts?



Exports of Hazardous Waste:  
(Part 262 Subpart E)

DATE 5/16/88

CA D 008314908

Yes

No

Comments

INSPECTOR Lowell

*Facility does not  
export H.W.*

Exports of H.W. are prohibited unless:  
262.52-

(a) Notification (262.53) has been  
provided?

(b) The receiving country has consented  
to accept the waste?

(c) A copy of the EPA Acknowledgment  
of Consent accompanies the shipment,  
and is attached to the the manifest or  
shipping paper?

(d) The H.W. shipment conforms to the  
receiving country's written terms in  
the EPA Acknowledgment of Consent?

Did the primary exporter of H.W. notify  
the EPA each calendar year of intended  
exports? 262.53(a)

Was the notification at least 60 days before  
the intended date of the initial off-site  
shipment for the calendar year? 262.53(a)

Did the notice signed by the primary  
exporter include his name and address  
and the following information, by  
consignee, for each H.W. type:  
262.53(a)(1), (2)-

(i) A description of the H.W., the  
EPA waste identification no. and the  
DOT shipping description (40 CFR 171-177)?

(ii) The estimated frequency and time  
span of exportation?

(iii) The estimated total quantity?

(iv) All points of entry to and departure  
from each foreign country the H.W. will  
pass through?

(v) How the waste will be transported  
(types of vehicles and containers)?

(vi) A description of how the waste  
will be treated, stored, or disposed of  
in the receiving country?

(vii) The name and site address of the  
foreign consignee(s)?

(viii) The name of each country the  
H.W. will pass through, for how long it  
will remain there, and how it will be  
handled during that time?

Exports of Hazardous Waste: Continued  
(Part 262 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was the export notification marked "Attention: Notification to Export" and sent to: Office of International Activities (A-106) EPA, 401 M St. SW., Washington DC 20460? 262.53(b)			* Facility does not export H.W.
Has the primary exporter not shipped waste until the notification was correct and an EPA Acknowledgment of Consent was received? 262.53(c)			
Does the exporter meet the requirements for use of the manifest, except that: 262.54-			DATE <u>5/16/88</u> CA D 008314908 INSPECTOR <u>Lowe</u>
(a-b) The name and address of the foreign consignees are substituted for the name, address and EPA ID No. of the designated facilities?			
(c) The generator identifies the point of departure from the U.S. under Special Handling Instructions and Additional Information?			
(d) The phrase "and conforms to the terms of the attached EPA Acknowledgment of Consent" is added to the end of the first sentence in the certification?			
(e) The primary exporter's appropriate State manifest is used where required?			
(f) The primary exporter requires that the consignee confirm delivery of H.W. in the foreign country (e.g., manifest signed by foreign consignee and returned to generator)?			
If the shipment could not be delivered to the consignees, did the primary exporter: 262.54(g)-			
(1) Renotify the EPA, request approval of shipment to a new consignee, and obtain a new EPA Acknowledgement of Consent prior to delivery? or:			
(2) Instruct the transporter to return the shipment to the U.S.? and:			
(3) Instruct the transporter to revise the manifest accordingly?			

Exports of Hazardous Waste: Continued  
(Part 262 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(h) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the manifest or shipping paper?			* Facility does not export H.W.
(i) The primary exporter provides an extra manifest copy for the transporter to give to U.S. Customs?			
Did the primary exporter file an Exception Report if: 262.55-			DATE <u>5/16/88</u> CA D 008314908 INSPECTOR <u>Lowe</u>
(a) A signed copy of the manifest from the transporter stating date and place of departure from U.S. had not been received in 45 days?			
(b) A written confirmation from the foreign consignee had not been received within 90 days?			
(c) The waste was returned to the U.S.?			
Has the facility submitted an Annual Report to the RA by March 1 of each year, summarizing the types, frequency, quantity, and ultimate destination of all H.W. exported during the previous calendar year? 262.56(a)			
Did the report include the following information: 262.56(a)-			
(1) EPA ID No., name, mailing and site and address of the exporter?			
(2) Calendar year covered by the report?			
(3) The name and site address of each consignee?			
(4) Description, EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped to each consignee, the name and ID No. of each transporter, the total amount of waste shipped and the number of shipments pursuant to each notification?			

Exports of Hazardous Waste: Continued  
(Part 262 Subpart E)

Yes    No    Comments

(5) Except for 100-1000 kg/mo. generators, each even numbered year:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? and:

(ii) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (prior to 1984 if available)?

(6) A signed certification which states:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Was the annual report sent to: Office of International Activities (A-106), EPA, 401 M Street SW., Washington DC 20460? \_\_\_\_\_

Did the primary exporter keep for at least three years a copy of each: 262.57(a)- \_\_\_\_\_

(1) Notification of intent to export (from the date the H.W. was accepted)? \_\_\_\_\_

(2) EPA Acknowledgment of Consent (from the date the H.W. was accepted by the initial transporter)? \_\_\_\_\_

(3) Confirmation of delivery (from the date the H.W. was accepted by the initial transporter)? \_\_\_\_\_

(4) Annual report (from the due date)? \_\_\_\_\_

DATE 5/16/88

CA D 008 314 908

INSPECTOR Lorne

Imports of Hazardous Waste  
(Part 262 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility import H.W. from a foreign country into the U.S.? 262.60(a)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
When importing H.W., do they comply with all manifest requirements except that: 262.60(b)-			
(1) The name, address, and EPA ID No. of the importer is used instead of the generator?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the importer use the manifest supplied and required by the consignment State? 262.60(c)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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CA D 008 314 908

INSPECTOR Lowe

**Farmers**  
**(Part 262 Subpart G)**

A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 270, 264, or 265 provided he: 262.70

The pesticides are from his own use? \_\_\_\_\_

Triple-rinses each pesticide container in accordance with 261.7(b)(3)? \_\_\_\_\_

Disposes of the residues on his own farm in a manner consistent with the disposal instructions on the pesticide label? \_\_\_\_\_

Yes

No

Comments

N/A

DATE.....

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INSPECTOR.....

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INSPECTOR Lome

\* Or 270 days if they have ship the waste over 30 miles.

Imports of Hazardous Waste  
(Part 262 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility import H.W. from a foreign country into the U.S.? 262.60(a)			
When importing H.W., do they comply with all manifest requirements except that: 262.60(b)-			
(1) The name, address, and EPA ID No. of the importer is used instead of the generator?			
(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?			
Did the importer use the manifest supplied and required by the consignment State? 262.60(c)			

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INSPECTOR Come

Generators of Between 100 and 1,000 kg/month That Accumulate H.W. in Tanks  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are ignitable or reactive waste not placed in a tank, unless: 265.201(e)(1)-			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? or:			Only stored in containers
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:			
(iii) The tank is used solely for emergencies?			
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201(e)(2)			
Unless 265.17(b) is complied with: 265.201(f)-			
(1) Are incompatible wastes stored in separate tanks?			
(2) Is H.W. not placed in unwashed tanks that previously held an incompatible waste or material?			

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